

EXHIBIT B

From: Adam Slater <ASlater@mazieslater.com>

Sent: Monday, May 10, 2021 6:11 PM

To: Schwartz, Barbara <BASchwartz@duanemorris.com>

Cc: valpec@kirtlandpackard.com; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: Re: MDL 2875 - Deposition Transcripts

Barbara - we do not believe there should be a stay of these deadlines. We need the transcripts to be final so leaving issues open doesn't really help anyone. It was certainly understood that these deadlines existed when the depositions started moving forward.

Thanks,

Adam Slater

On May 10, 2021, at 4:34 PM, Schwartz, Barbara <BASchwartz@duanemorris.com> wrote:

Counsel,

Please let us know by 10 a.m. tomorrow morning whether you will agree to the stay. We would like to include this issue in tomorrow's position statement if there is any disagreement as to staying the 45-day deadline discussed in my email below.

Thank you,

Barbara

Barbara A. Schwartz

Associate

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: +1 215 979 1871
F: +1 215 689 4924

BASchwartz@duanemorris.com
www.duanemorris.com

From: Schwartz, Barbara

Sent: Friday, May 7, 2021 5:48 PM

To: Adam Slater <ASlater@mazieslater.com>; valpec@kirtlandpackard.com

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: MDL 2875 - Deposition Transcripts

Counsel,

We would like to work out an agreement to address corrections and signature of transcripts relating to depositions of ZHP witnesses who do not speak English. In order to reach an agreed approach to handling these transcript corrections, we would like to stay the 45-day time frame allowed by Case Management Order No. 20 for delivery of errata and signature. Please notify us by Tuesday, May 11, if you object to this stay of the 45-day period.

Regards,
Barbara

Barbara A. Schwartz

Associate

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: +1 215 979 1871
F: +1 215 689 4924

BASchwartz@duanemorris.com
www.duanemorris.com

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

Confidentiality Notice: This electronic mail transmission is privileged and confidential and is intended only for the review of the party to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege.